

MEMORANDUM

To: Valmichael Leos and Barbara Nann
U.S. Environmental Protection Agency

Date: July 27, 2012

From: John Laplante, John Verduin, Wendell Mears,
and David Keith, Anchor QEA

Project: 090557-01

Cc: Gary Miller, USEPA
Philip Slowiak, IP
March Smith, MIMC
David Moreira, MIMC

Re: Time Critical Removal Action (TCRA), Quarterly Monitoring Maintenance
Requirements Report

Introduction

Visual inspections of the Time Critical Removal Action (TCRA) armored cap at the San Jacinto River Waste Pits Superfund Site (Site) were conducted on July 20, 2012, as part of the post-construction monitoring program for the TCRA. That inspection revealed cap thinning and exposed geotextile in discrete locations along the upland portion of the western edge of the western berm of the Site impoundments. This memorandum describes the visual inspection of July 20, 2012, as well as the subsequent inspections and field observations that were conducted on July 21, 22, and 24, 2012. The Final Quarterly Inspection Report, including descriptions of the fencing, signs, and full bathymetric and topographic survey data, will be provided to the U.S. Environmental Protection Agency (USEPA) as soon as practical after all data associated with these TCRA Site visits are available and surveys are completed. This document focuses on the findings along the western berm of the impoundments as they relate to planned maintenance activities.

Background

The TCRA was implemented by International Paper Company (IP) and McGinnes Industrial Maintenance Corporation (MIMC) under an Administrative Settlement Agreement and Order on Consent (AOC) with the USEPA – Docket No. 06-12-10, effective May 17, 2010. A

full description of the TCRA implementation is provided in the associated project documentation:

- Removal Action Work Plan (RAWP; Anchor QEA 2010, 2011)
- Revised Draft Final Removal Action Completion Report (RACR; Anchor QEA 2012)

The inspection summarized in this document was conducted in accordance with the Operations, Monitoring, and Maintenance (OMM) Plan (Appendix N of the RACR – Anchor QEA 2012)¹. The OMM Plan specifies the timing, pertinent items, tolerances, and procedures for inspection and maintenance of the protective cap installed for the TCRA at the Site.

Inspection and Data Collection

The purpose of this report is to document the inspection and data collection completed and list ongoing efforts leading to development of a proposed repair plan for the protective cap on the western berm.

Visual Inspection

The initial visual inspection included observing the entire exposed area of the armored cap during low tide conditions on July 20, 2012. No discrepancies of the cap, fencing, or signage associated with the TCRA were observed, other than the areas requiring maintenance on the western berm discussed below.

The visual inspection indicated intermittent and discrete areas along the western berm where the cap armor was thin and exposed geotextile was observed. The geotextile layer was clean, undamaged, and there is no evidence that the underlying materials were exposed. Photographs taken during the inspections that document these observations are attached (Figures A-1 and A-2). There was no damage observed to on-Site signage or the perimeter fencing. All other portions of the armored cap that were visible during the inspection were observed to be intact, with no breaches or other damage.

¹ The OMM Plan is an appendix to the Revised Draft Final RACR, and authorization to implement the OMM Plan was contained in an email from USEPA dated January 18, 2012.

Surveys

The horizontal and vertical extent of the segments along the western berm that require maintenance were surveyed, collecting topographic data 25 feet beyond these areas for maintenance planning. The survey was conducted by Hydrographic Consultants, Ltd. on the morning of July 24, 2012. Completion of topographic and bathymetric surveys for the remainder of the Site are scheduled for the week of July 30, 2012, weather permitting.

References

Anchor QEA, LLC (Anchor QEA), 2010. *Removal Action Work Plan*, San Jacinto River Waste Pits Superfund Site. Prepared for U.S. Environmental Protection Agency (USEPA) Region 6 on behalf of McGinnes Industrial Maintenance Corporation and International Paper Company. November 2010.

Anchor QEA, 2011. *Removal Action Work Plan*, San Jacinto River Waste Pits Superfund Site. Prepared for U.S. Environmental Protection Agency (USEPA) Region 6 on behalf of McGinnes Industrial Maintenance Corporation and International Paper Company. Revised February 2011.

Anchor QEA, 2012. *Revised Draft Final Removal Action Completion Report*, San Jacinto River Waste Pits Superfund Site. Prepared for McGinnes Industrial Maintenance Corporation, International Paper Company, and U.S. Environmental Protection Agency (USEPA) Region 6. Revised March 2012.

USEPA, 2010. *Administrative Settlement Agreement and Order on Consent for Removal Action*. U.S. Environmental Protection Agency Region 6 CERCLA Docket No. 06-03-10. In the matter of: San Jacinto River Waste Pits Superfund Site Pasadena, Harris County, Texas. International Paper Company and McGinnes Industrial Management Corporation, Respondents.
